

# **APPENDIX J**

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

New England Telephone and Telegraph Company, d/b/a  
Verizon-Massachusetts - Section 271 of the  
Telecommunications Act of 1996 Compliance Filing

D.T.E. 99-271

**COMMENTS OF AT&T COMMUNICATIONS OF NEW ENGLAND, INC.  
REGARDING PARTIAL DATA RECONCILIATION**

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*Redacted – For Public Distribution*

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**Introduction.**

Validity of the data underlying Verizon's performance statistics is critical, both for the initial Section 271 review and for the eventual effective operation of a performance assurance plan ("PAP" or "anti-backsliding plan"). Beginning in September, 1999, and throughout this proceeding, AT&T has sought to test the validity of Verizon's data underlying its performance metrics. From the very beginning, and continuing throughout this proceeding, Verizon has vigorously resisted and successfully avoided comprehensive production of its data that would allow a verification of that data against in-the-field events.<sup>1</sup> In September, 2000, after Department staff arranged to have Verizon provide purchase order numbers ("PONs") for \*\*\* hot-cut transactions, the Department oversaw a limited "data reconciliation" between AT&T and Verizon involving 36 of the \*\*\* PONs.

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<sup>1</sup> A fuller reconciliation to test the integrity of Verizon's raw data is particularly important given that raw data verification was not performed by KPMG in its Massachusetts OSS test. *See* KPMG Draft Report at 588.

In this filing, AT&T reports the results of that reconciliation. In summary, the reconciliation of the 36 PONs was a sensible starting point, as its results clearly demonstrate the need for a further, more comprehensive review and reconciliation of Verizon's data. In and of itself, the reconciliation of the 36 PONs was far too limited and artificially constrained to permit an accurate evaluation of Verizon's scoring of its own performance. It was, however, sufficient to indicate that the statistical measures upon which Verizon relies, both for Section 271 approval and for the effectiveness of its anti-backsliding plan, are based on unreliable data caused, in part, by undefined rules for calculating results when manual scoring is used. The details are set forth below.

### **Background.**

AT&T's efforts to obtain the data underlying Verizon's self-reported statistics began almost immediately after Verizon filed its initial application and affidavits in May, 1999. At the first opportunity provided by the Department, AT&T proposed information requests seeking underlying data. *See First Set of Discovery Requests Submitted by ATT In Preparation for the November 19, 1998, Technical Sessions*, filed on September 17, 1999 (*see, e.g.*, information requests 1-33, 1-34, 1-39 and 1-40). Verizon's resistance began immediately and its putative "justifications" for not providing data proved ungrounded.<sup>2</sup>

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<sup>2</sup> In DTE-ATT 1-33, for example, AT&T had sought the data underlying Verizon's claims of percentage on-time completions for UNE-loop hotcuts. Verizon initially refused to provide this data to AT&T or any of the other participants on grounds of confidentiality. The Department addressed Verizon's Motion for Protective Treatment on November 10, 1999, at a conference attended by KPMG and counsel for both Verizon and AT&T. At the conference, counsel for Verizon claimed that the requested data contained proprietary information and stated that Verizon could not provide the requested data in redacted form because Verizon did not have the software needed to mask the sensitive information. *See Hearing Officer Rulings on Scheduling Announcements and Decisions on Motions for Confidential Treatment*, D.T.E. 99-271, January 26, 2000. Verizon's counsel also claimed that it would be unduly burdensome to create new software to perform the necessary masking. *See id.* In response, the Department asked KPMG to do the necessary masking. *See id.* Immediately, Verizon reversed its course and admitted that it could do the necessary masking. *See id.* ("Upon notification that the Department would direct  
(continued...)

After a year of seeking to obtain data underlying Verizon's performance statistics for *literally hundreds* of individual transactions covering a range of maintenance, repair and provisioning activity, including UNE-loops, IDLC, and trunking, the data reconciliation between Verizon and AT&T consisted of a review of only 36 transactions, involving UNE-loop orders. For the reasons discussed below, this reconciliation, albeit a useful starting point, was far too limited to permit the conclusion that the broad range of statistics upon which Verizon relies for its Section 271 application accurately reports experience in the field.

### **Comments.**

#### **I. THE "RECONCILIATION" WAS NOT COMPLETE.**

##### **A. Description of Data Reconciliation and Its Results.**

In its May, 2000, Checklist Affidavit, Verizon reported that \*\*\* UNE-loop orders had been scheduled by AT&T to be cut. Verizon further reported that \*\*\* of those \*\*\* had, in fact, been cut during that period and that its monthly on-time performance ranged from 94% to 100%. *See* Checklist Affidavit, ¶ 177. AT&T sought the Verizon data underlying all \*\*\* orders, so that Verizon's records could be matched against AT&T's records. AT&T initially received only identifying purchase order numbers ("PONs") for the \*\*\* orders and, after further efforts, eventually received the "score" that Verizon had assigned each order (either, "rescheduled," "met," or "missed"). AT&T, however, never received the raw data underlying the \*\*\* PONs. As a result, it was never possible to review in tandem the information from both companies

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(continued...)

KPMG to perform this work, counsel for Verizon indicated that Verizon [would] instead do this work internally."). Despite an order from the Department requiring Verizon to complete the masking of confidential data by February 11, 2000 (*see id.*), Verizon *never* provided the data in a form in which its accuracy could be evaluated.

regarding the \*\*\* PONs – the kind of review that is necessary to reach a conclusive determination on the accuracy of Verizon’s raw data.

After receiving the PONs for the \*\*\* orders and the “score” assigned by Verizon, AT&T searched its own records for each of the \*\*\* PONs. As a result of that search, AT&T identified 22 orders that had sufficient information in AT&T’s records *alone* to seriously call into question Verizon’s scoring as a “met” (referred to as the “A-list” PONs). AT&T identified another 14 PONs out of the \*\*\* that could not be matched to any transaction in AT&T’s records (the “B-list” PONs), either because the PONs were not AT&T PONs or they included typographical errors that made it impossible to match up to AT&T PONs. After receiving AT&T’s B-list, Verizon eliminated the non-AT&T PONs and corrected the AT&T PONs. Using the remaining, corrected AT&T PONs, AT&T eliminated the PONs that the two companies agreed upon. This left 3 PONs from the B-list to be reconciled.

From the A-list, the companies reconciled only 15 of the 22 PONs. Two of the seven that were not reconciled appear to have been scored correctly by Verizon in its initial scorecard and were taken off the list. The remaining five that were not reconciled had, in fact, involved a Verizon “miss” according to AT&T’s records, but had *not* been scored as such by Verizon. They were not reconciled, however, because all five of those orders had been cancelled by the end-user prior to completion. Thus, although AT&T views those as a “miss” because Verizon in fact missed the due date, according to the C2C definitions they are not a “miss” because they were never completed. *See* Tr., p. 4414.

The two companies, therefore, reconciled 18 PONs altogether. Out of the 18, 9 remain as scored by Verizon, 6 were changed from met to missed and 3 could not be agreed on by the

parties. Verizon and AT&T jointly submitted those three to Department staff for resolution.

AT&T is not aware of the Department's resolution of the remaining three PONs.

**B. The Data Reconciliation Is Incomplete Because It Does Not Reconcile All Of The \*\*\* Orders Reported In The Statistics And Because The \*\*\* Orders Have Not Been Determined To Be The Universe Of Orders Scheduled During The Relevant Period.**

Even assuming that the \*\*\* PONs identified by Verizon accurately reflect the universe of orders scheduled during the relevant period (an assumption that, as explained below, is not likely correct), the data reconciliation is still incomplete. This is because the two companies began with only 36 PONs, not the \*\*\* PONs at issue. The 36 PONs were identified either because AT&T's records very clearly captured Verizon defects (the A-list PONs) or because the PONs could not be matched at all with AT&T records due to clerical or typographical errors by Verizon (the B-list PONs). Excluded from the reconciliation were the vast majority of PONs for which records of both companies, reviewed in tandem, are required to reach a conclusive determination of what happened. Considering that the reconciliation of 18 PONs resulted in 33% changed scoring before Department resolution of the disputed PONs,<sup>3</sup> it is likely that a full reconciliation would produce additional scoring changes. As Mr. Poleté stated in his testimony, there were many orders not included in the original 36 for which AT&T's records strongly suggested a "miss" due to Verizon. *See* Tr., p. 4508-9. Nevertheless, in an effort to be extremely conservative, AT&T did not include them in the original A-list. As a result, any reconciliation limited to the original list of 36 will fail to pick up other orders that were mis-scored.

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<sup>3</sup> If the Department rules in AT&T's favor on the three disputed PONs, fully 50% of the reconciled PONs will be incorrectly scored by Verizon.



The universe of orders to be reconciled, however, may not be the \*\*\* reported by Verizon. In the limited reconciliation that AT&T and Verizon performed, the universe of orders to be reconciled was defined by the \*\*\* orders that Verizon claims were the orders that were scheduled for hot-cuts during the July 1999, to February 2000, period. AT&T began with only those transactions and reviewed its records for only those transactions. In the limited time available, AT&T was not able to identify all of the transactions during that period reflected in AT&T's records. Thus, no comparison was made between the orders that Verizon claims were scheduled and worked during the relevant period and the universe of orders that could be established from a complete reconciliation. Given the potential for Verizon's data set to omit orders that involved a "missed appointment," the two companies may have begun with a biased sample of all the orders scheduled during that period.

In sum, a data reconciliation necessarily involves a comparison of *all* the orders that both of the two companies contend occurred during a specified period. The limited data reconciliation undertaken to date is inadequate on two counts. First, it began with only those orders that Verizon reported, not an unbiased sample to begin with. It then was limited by time constraints to a tiny fraction of those orders for which AT&T's records were most clear. The results of such a limited data reconciliation do not provide a basis for comprehensively evaluating Verizon's raw data and thus its performance.

## **II. RESULTS OF THE RECONCILIATION DO NOT ACCURATELY REFLECT EXPERIENCE IN THE FIELD.**

In addition to the problems of the reconciliation itself, it is important to keep in mind that the metrics themselves fail to capture the actual experience in the field. As AT&T has discussed previously, there are situations in which AT&T is forced to request a supp on account of a

Verizon failure. In these situations, the metric is scored merely as a supp or “customer not ready” and is not held as a Verizon miss.

Erroneous, or incorrect, LSRCs constitute one category of this type of problem. This problem most often takes the form of Verizon’s exclusion of the correct cable and pair assignments from the LSRC. This information is essential to ensure that Verizon has assigned the correct cable identification in its internal orders. Without such verification, there is the possibility that the order could be assigned to the wrong cable in Verizon’s downstream systems. The result may be the inability of a Verizon technician to detect AT&T dial tone. This then can result in a delayed due date because AT&T will reschedule the order by issuing a supp to change the due date to allow AT&T and Verizon to resolve the cable/pair issue. The supp to change the due date is requested by AT&T in order to avoid a service outage when there is confusion between the companies on LSRC issues like cable and pair. Although the metric will not capture this as a Verizon “miss,” it was Verizon’s failure to return the correct cable and pair that permitted this problem to occur.

Late or non-existent LSRCs constitute another category of problem. Under the existing electronic data interchange (“EDI”) interface, AT&T will submit an LSR, Verizon’s systems will receive it and assign it a due date with the correct notification properly distributed within Verizon’s internal organization. However, in some instances, Verizon’s OSS fail to return the LSRC to AT&T with the due date information, or – if the LSRC is returned – it is returned so late and so close to the scheduled due date that AT&T does not have sufficient notice to prepare for the cut. In these situations, AT&T is required to supp the order. Although the metric will not capture this as a Verizon “miss,” it was Verizon’s failure to return timely the LSRC that caused the problem to occur.

There are other ways, apart from LSRC issues, in which the current scoring does not reflect reality on-the-ground. Most significantly, under current C2C scoring rules, an order is not scored as a “met” or “miss” until it is completed. As a result, Verizon may miss an order in, for example, June, and it will be supposed to July. It is not scored at all in June. If the order is completed in July, it is supposed to be marked as a miss for July statistics, even if it is on-time in July. This is because it had been missed in June, and “once a miss, always a miss” under C2C rules. *See Tr.*, p. 4491. There are several ways in which this scoring convention results in statistics that do not reflect reality. First, an order could be missed by Verizon several times, but it would show up only as one miss. Thus, multiple frustrations and disruptions are penalized as if they are one, even though each changed due date results in heightened customer dissatisfaction and increases the likelihood that the end-user will cancel the order. Second, an order could be missed by Verizon one or more times, but it would never be counted as a miss if the customer – presumably in frustration – cancels his order and the order is never completed. (As discussed above, this was the case in *five* of the 36 PONs reviewed.)

The scoring rule that counts a “miss” only if the order is ultimately worked creates a number of problems. First, there is the simple problem of record keeping and policing to ensure that someone at Verizon knows that a cut, although on-time in the current month, should be scored as a “miss” because there is a “miss” in its history. Second, and more important, is the perverse incentive that this scoring rule creates. If Verizon is managing its hot-cuts on a particular day and finds that it is short-staffed, it will have an incentive to push off the orders that have *already* been missed, since a second miss does not count against it. Indeed, Verizon has an incentive to continue to push off the order because it will never count as a miss if the end-user

ultimately cancels the order. Certainly, an attempt to measure Verizon's performance should not incent Verizon to do worse.

**III. DESPITE ITS LIMITED NATURE, THE RECONCILIATION DEMONSTRATES THAT VERIZON'S DATA ARE NOT VALID AND CANNOT BE RELIED UPON, EITHER FOR SECTION 271 REVIEW OR AS THE BASIS OF AN ANTI-BACKSLIDING PLAN.**

When challenged, Verizon agreed that fully one-third of the hot-cuts reviewed with AT&T that Verizon had scored as "mets" should have been scored as "misses." Another 30% remained subject to dispute. Such a record hardly provides confidence that the performance statistics upon which Verizon relies for its Section 271 application are valid. Nor does this record indicate that the anti-backsliding plan upon which Verizon's future performance is to be "assured" is based on performance data that are "above suspicion." As the Federal Communications Commission ("FCC") stated in its review of Southwestern Bell Telephone's Section 271 application for Texas,<sup>4</sup> "Because the Performance Remedy Plan rests entirely on SWBT's performance as captured by the measurements, the credibility of the performance data should be *above suspicion*." *Id.* at ¶ 429 (emphasis added).

On this record, the FCC cannot have confidence that the statistics upon which Verizon relies are valid and cannot have confidence that the PAP that is supposed to ensure Verizon's future performance is based on statistics that actually measure Verizon's performance. Only after a thorough and complete data reconciliation that results in a comprehensive evaluation of Verizon's scoring method, preceded by a well defined set of manual scoring rules, will the FCC be able to determine Verizon's true performance. Only after procedures have been established

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<sup>4</sup> See *In the matter of Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Texas*, CC Docket No. 00-65, Memorandum Opinion and Order FCC 00-238 (released June 30, 2000) ("SWBT Order").

for on-going data reconciliation, such as the procedures developed by the Texas Public Utilities Commission for that state, will the FCC be confident that the PAP will, indeed, *assure* Verizon's performance.

Equally important, this limited reconciliation highlights the need for the Department to fill a critical gap in the hot-cut process by establishing clearly defined scoring methods for manually derived results. The complete picture of Verizon's ability to provide unbundled loops has to include examination of a set of metrics that includes: Due Date supps and customer requested cancels issued as a result of Verizon problems (PR 9-09), open orders in a hold status by Verizon (PR-8), service outages during hot cuts (PR-6-02 I codes) and % on time performance (PR-9-01). In short, the Department does not need to develop new metrics; that work has already been done. It can, however, make a real contribution to policy by filling a void in the current measurement of hot-cut performance by establishing penalties on the basis of the combined effect of these key metrics.


#### **Conclusion.**

The limited reconciliation conducted on September 6<sup>th</sup> and completed on September 20<sup>th</sup> is a useful starting point, as its results indicate that Verizon's performance statistics do not meet the FCC's standard of being "above suspicion." Both the Massachusetts Department and the FCC are entitled to data in which they can have confidence, both for purposes of Section 271 approval and for purposes of continued Verizon performance after Section 271 approval. Moreover, the data that the Department and the FCC review should be generated by metrics that measure the reality on-the-ground, that is, the actual end-user experience. Those metrics and data have not yet been provided by Verizon in this record.

Furthermore, the results of this limited reconciliation indicate that there is an opportunity and a need for the Department to make a key contribution to the accurate measurement of hot-cut

performance by: (1) establishing clear definitions on manual scoring, and (2) requiring that the above-mentioned critical hot-cut metrics form the basis for assessing penalties for poor hot-cut performance by Verizon. The Department should require clear definitions for manual scoring and require that critical hot-cut metrics contribute to penalties before it recommends Section 271 approval.

Respectfully submitted,

  
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September 28, 2000

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the attorney of record for each other party on September 28, 2000.

**K**

# APPENDIX K



January 4, 2000

## **OBSERVATION REPORT #10**

**KPMG observed a discrepancy between RETAS on-line help and the RETAS Student User Guide for CLECs.**

### **Issue 10.1**

When RETAS on-line help is requested by highlighting the "Circuit ID" hyperlink, the user is directed to reference Appendix E of the RETAS Student User Guide for CLECs to obtain valid circuit ID formats. In fact, valid circuit ID formats are documented in Appendix D.

### **Issue 10.2**

When RETAS on-line help is requested by highlighting the "Test Result Code" hyperlink, the user is directed to reference Appendix F of the RETAS Student User Guide for CLECs to obtain MLT test result codes. In fact, valid MLT test result codes are documented in Appendix E.

### **Assessment**

The observations point to a flaw in the internal consistency of paper and on-line versions of RETAS user documentation. Specifically, incorrect referencing of RETAS on-line help to customer documentation can impact the efficiency of a CLEC in locating RETAS reference information.

**L**

# **APPENDIX L**

## **OBSERVATION REPORT #55**

**KPMG has observed several areas of Bell Atlantic non-compliance with industry change control policies.**

### **Issue**

Bell Atlantic's change control policies define intervals for notifying and documenting customer affecting changes. The intervals defined for Bell Atlantic initiated (Type 4) changes are:

1. CLECs are provided fifteen (15) business days of review and comment between the release of the initial documentation and final documentation.
2. Final documentation must be released forty-five (45) calendar days prior to the scheduled implementation date of the change item.

These intervals provide a minimum of sixty-six (66) days between the initial documentation release and the implementation date.

Based on a review of Type 4 changes implemented between October 1, 1999 – March 28, 2000, several areas of non-compliance with change control policies were noted:

1. In 14 of 29 cases (48%), documentation was released prior to the scheduled implementation date without providing the required fifteen (15) business days for CLEC review and comment.
2. In 28 of 29 cases (97%), final documentation for Type 4 changes was released prior to the scheduled implementation date without providing the required forty-five (45) calendar days notification.

Bell Atlantic appears to regard changes to order flowthrough capability as non-interface affecting and therefore exempt from intervals applicable to interface affecting Type 4 changes. This distinction does not appear to be specified in the change control policy documentation. Since CLEC staffing and business operations could be impacted by enhancements or other changes in order flowthrough capability, such changes may be interface affecting. If it is assumed that notification and documentation intervals apply to flowthrough changes, none of the nine (9) flowthrough changes examined met the required documentation interval.

### **Assessment**

CLECs may potentially be impeded from making timely changes to their systems and business processes in situations when Bell Atlantic does not provide timely notification and documentation about planned changes.

				Documentation Date				
1	803	2/19/00	4	Initial Documentation No <sup>2</sup>  Final Documentation No <sup>3</sup>	No (0/66d)	No (0/21d)	No (0/45d)	(flowthrough) DTOHC – Listings Hot Cut Flowthrough - North
2	972	2/19/00  2/27/00  3/1/00	4	Initial Documentation 12/14/99 <sup>4</sup>  Final Documentation 2/16/00 <sup>5</sup>  Updated Implementation Date 2/18/00 <sup>6</sup>  Updated Implementation Date 2/27/00 <sup>7</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre-Order Business Rules, EDI Specifications, and CORBA Specs.  Active CIC Code in the North
3	975	2/19/00  2/27/00  3/1/00	4	Initial Documentation (LSOG4) 10/25/99 <sup>8</sup>  Final Documentation (LSOG4) 2/16/00 <sup>9</sup>  Updated Implementation (LSOG4) Date 2/18/00 <sup>10</sup>  Updated Implementation (LSOG4) Date 2/27/00 <sup>11</sup>	Yes 10/25/99 – 3/1/00 (128/66d) LSOG4	Yes 10/25/99 – 2/16/00 (114/21d) LSOG4	No 2/16/00 – 3/1/00 (14/45d) LSOG4	LSOG3/LSOG 4 Pre-Order Business Rules, EDI Specifications, and CORBA Specifications  Uniform Appointment Times North and South
4	977	2/19/00  2/27/00  3/1/00	4	Initial Documentation 12/14/99 <sup>12</sup>  Final Documentation 2/16/00 <sup>13</sup>  Updated Implementation Date 2/18/00 <sup>14</sup>  Updated Implementation Date 2/27/00 <sup>15</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre-Order Business Rules, EDI Specifications, and CORBA Specs.  Allow optional input of CUSCODE for Parsed and Unparsed CSRs
5	978	2/19/00  2/27/00	4	Initial Documentation 12/14/99 <sup>16</sup>  Final Documentation 2/16/00 <sup>17</sup>  Updated Implementation	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre-Order Business Rules, EDI Specifications, and CORBA Specs.

		3/1/00		Date 2/18/00 <sup>18</sup> Updated Implementation Date 2/27/00 <sup>19</sup>				Remove SAPR and LAPR fields
6	1011	2/19/00  2/27/00  3/1/00	4	Initial Documentation 12/14/99 <sup>20</sup>  Final Documentation 2/16/00 <sup>21</sup>  Updated Implementation Date 2/18/00 <sup>22</sup>  Updated Implementation Date 2/27/00 <sup>23</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre- Order Business Rules, EDI Specifications, and CORBA Specs.  Remove the CAI field from Address Validation/TN Reservation
7	1016	2/19/00  2/27/00  3/1/00	4	Initial Documentation 12/14/99 <sup>24</sup>  Final Documentation 2/16/00 <sup>25</sup>  Updated Implementation Date 2/18/00 <sup>26</sup>  Updated Implementation Date 2/27/00 <sup>27</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre- Order Business Rules, EDI Specifications, and CORBA Specs.  Remove restriction on Route and Box in the North
8	1017	2/19/00  2/27/00  3/1/00	4	Initial Documentation 12/14/99 <sup>28</sup>  Final Documentation 2/16/00 <sup>29</sup>  Updated Implementation Date 2/18/00 <sup>30</sup>  Updated Implementation Date 2/27/00 <sup>31</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre- Order Business Rules, EDI Specifications, and CORBA Specs.  Change Translation of the TOS field to acceptable backend values
9	1018	2/19/00  2/27/00  3/1/00	4	Initial Documentation (LSOG4) 12/14/99 <sup>32</sup>  Final Documentation 2/16/00 (LSOG4) <sup>33</sup>  Updated Implementation (LSOG4) Date 2/18/00 <sup>34</sup>  Updated Implementation	Yes 12/14/99 – 3/1/00 (78/66d) LSOG4	Yes 12/14/99 – 2/16/00 (64/21d) LSOG4	No 2/16/00 – 3/1/00 (14/45d) LSOG4	LSOG4/ LSOG3 Pre- Order Business Rules  Make the Yellow Light Response Green for North

				(LSOG4) Date 2/27/00 <sup>35</sup>				
10	1019	2/19/00	4	Initial Documentation 12/14/99 <sup>36</sup>  Final Documentation 2/16/00 <sup>37</sup>  Updated Implementation Date 2/18/00 <sup>38</sup>  Updated Implementation Date 2/27/00 <sup>39</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre- Order Rules, EDI Specifications, and CORBA Specs.  Make LA Zip Code 12 bytes across all Pre- Order
11	1020	2/19/00	4	Initial Documentation (LSOG4) 10/25/99 <sup>40</sup>  Final Documentation (LSOG4) 2/16/00 <sup>41</sup>  Updated Implementation (LSOG4) Date 2/18/00 <sup>42</sup>  Updated Implementation (LSOG4) Date 2/27/00 <sup>43</sup>	Yes 10/25/99 – 3/1/00 (128/66d) LSOG4	Yes 10/25/99 – 2/16/00 (114/21d) LSOG4	No 2/16/00 – 3/1/00 (14/45d) LSOG4	LSOG3/LSOG 4 Pre-Order Business Rules, EDI Specifications, and CORBA Specifications  Make WTN Search on BLOB CSR Common (Pre- Order)
12	1022	2/19/00	4	Initial Documentation 12/14/99 <sup>44</sup>  Final Documentation 2/16/00 <sup>45</sup>  Updated Implementation Date 2/18/00 <sup>46</sup>  Updated Implementation Date 2/27/00 <sup>47</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre- Order Business Rules, EDI Specifications, and CORBA Specs.  Loop Qual Basic – 2000 byte Response Parsed (Pre- Order)
13	1023	2/19/00	4	Initial Documentation 12/14/99 <sup>48</sup>  Final Documentation 2/16/00 <sup>49</sup>  Updated Implementation Date 2/18/00 <sup>50</sup>  Updated Implementation Date 2/27/00 <sup>51</sup>	Yes 12/14/99 – 3/1/00 (78/66d)	Yes 12/14/99 – 2/16/00 (64/21d)	No 2/16/00 – 3/1/00 (14/45d)	LSOG4 Pre- Order Business Rules, EDI Specifications, and CORBA Specs.  Change Name Field on Loop Qual Response to 25 Bytes
14	1025	2/19/00	4	Initial Documentation	Yes	Yes	No	LSOG4 Pre-

		2/27/00  3/1/00		12/14/99 <sup>52</sup>  Final Documentation 2/16/00 <sup>53</sup>  Updated Implementation Date 2/18/00 <sup>54</sup>  Updated Implementation Date 2/27/00 <sup>55</sup>	12/14/99 – 3/1/00 (78/66d)	12/14/99 – 2/16/00 (64/21d)	2/16/00 – 3/1/00 (14/45d)	Order Business Rules, EDI Specifications, and CORBA Specs.  Change Expanded Options Indicator to a Default of “Direct”
15	1114	2/19/00  2/27/00  3/1/00	4	Initial Documentation None  Final Documentation None  Updated Implementation Date 2/18/00 <sup>56</sup>  Updated Implementation Date 2/27/00 <sup>57</sup>	No (0/66d)	No (0/21d)	No (0/45d)	Decommission ing of Non- LSRs
16	499	10/16/99	4	Initial Documentation 9/2/99 <sup>58</sup>  Final Documentation 9/2/99 <sup>59</sup>	No 9/2/99 – 10/16/99 (44/66d)	No (0/21d)	No 9/2/99 – 10/16/99 (44/45d)	Pre-Order Business Rules and EDI Specifications
17	890	10/16/99	4	Initial Documentation 10/7/99 <sup>60</sup>  Final Documentation 10/7/99 <sup>61</sup>	No 10/7/99 – 10/16/99 (9/66d)	No (0/21d)	No 10/7/99 – 10/16/99 (9/45d)	TIS Local Service Common Web GUI  Web GUI Phase III
18	842	10/30/99	4	Initial Documentation None  Final Documentation None	No (0/66d)	No (0/21d)	No (0/45d)	(flowthrough) Resale to Loop w/LNP migrations - North
19	1053	10/30/99	4	Initial Documentation 10/28/99 <sup>62</sup>  Final Documentation 10/28/99 <sup>63</sup>	No 10/28/99 – 1030/99 (2/66d)	No (0/21d)	No 10/28/99 – 1030/99 (2/45d)	(flowthrough) Modifications to Platform Flowthrough
20	1054	10/30/99	4	Initial Documentation 10/28/99 <sup>64</sup>  Final Documentation	No 10/28/99 – 1030/99 (2/66d)	No (0/21d)	No 10/28/99 – 1030/99 (2/45d)	(flowthrough) Error Messages



				10/28/99 <sup>65</sup>				
21	1045	12/18/99	4	Initial Documentation None  Final Documentation None	No (0/66d)	No (0/21d)	No (0/45d)	(flowthrough) Creation of EDI and Web Transaction Status Reports
22	1061	12/18/99  12/20/99	4	Initial Documentation None  Final Documentation None  Release Date Deferred from 12/18/99 to 12/20/99 <sup>66</sup>	No (0/66d)	No (0/21d)	No (0/45d)	(flowthrough) UNE Platform Migration for Call Forward II
23	1062	12/18/99  12/20/99	4	Initial Documentation None  Final Documentation None  Release Date Deferred from 12/18/99 to 12/20/99 <sup>67</sup>	No (0/66d)	No (0/21d)	No (0/45d)	(flowthrough) UNE Partial Migration of Platform with no BTN changes
24	1063	12/18/99  12/20/99	4	Initial Documentation None  Final Documentation None  Release Date Deferred from 12/18/99 to 12/20/99 <sup>68</sup>	No (0/66d)	No (0/21d)	No (0/45d)	(flowthrough) UNE Platform Migration of straight-line additional listings
25	1064	12/18/99  12/20/99	4	Initial Documentation None  Final Documentation None  Release Date Deferred from 12/18/99 to 12/20/99 <sup>69</sup>	No (0/66d)	No (0/21d)	No (0/45d)	(flowthrough) UNE Platform Migration of straight-line additional listings with Ringmate and with adding Ringmate
26	906	12/18/99	4	Initial Documentation 12/6/99 <sup>70</sup>  Final Documentation 12/6/99 <sup>71</sup>	No 12/6/99 – 12/18/99 (12/66d)	No (0/21d)	No 12/6/99 – 12/18/99 (12/45d)	LSOG4 Pre Order Business Rules & EDI specs  XDSL Loop Qual- Addition

								of X4 Valid Entry in ADSLQUALC D
27	973	2/19/00  2/27/00  3/1/00	4	Initial Documentation 12/14/99 <sup>72</sup>  Final Documentation 2/17/00 <sup>73</sup>  Updated Implementation Date 2/18/00 <sup>74</sup>  Updated Implementation Date 2/27/00 <sup>75</sup>	Yes 12/14/99 -- 3/1/00 (78/66d)	Yes 12/14/99 -- 2/17/00 (65/21d)	No 2/17/00 -- 3/1/00 (13/45d)	LSOG4 Order Business Rules and EDI Specifications  Standardize on YPPA Code for Directory Ordering/ Listing
28	870	10/16/99	4	Initial Documentation 9/2/99 <sup>76</sup>  Final Documentation 9/2/99 <sup>77</sup>	No 9/2/99 -- 10/16/99 (44/66d)	No (0/21d)	Yes 9/2/99 -- 10/16/99 (44/45d)	KPMG Exception 41
29	919	2/19/00  2/27/00  3/1/00	4	Initial Documentation 12/14/99 <sup>78</sup>  Final Documentation 2/16/00 <sup>79</sup>  Updated Implementation Date 2/18/00 <sup>80</sup>  Updated Implementation Date 2/27/00 <sup>81</sup>	Yes 12/14/99 -- 3/1/00 (78/66d)	Yes 12/14/99 -- 2/16/00 (64/21d)	No 2/16/00 -- 3/1/00 (14/45d)	LSOG4 Pre- Order Business Rules and EDI specs.  Modify Loop Qualification transaction to allow inquiry by either QUALTEL or Address fields in order to accommodate UNE-Loop Scenario

<sup>1</sup> Approx. 21 calendar days.<sup>2</sup> Industry Change Control February 2000<sup>3</sup> Industry Change Control February 2000<sup>4</sup> FLASH 12/14/99 bulletin "Part 3 of 8 :Bell Atlantic's LSOG4 Combined Common Report of Bell Atlantic's Pre-Order Business Rules, v 4.1.1 and EDI Specifications, v 4.1.1"<sup>5</sup> FLASH 2/16/00 bulletin "Part 1 of 2: Bell Atlantic's LSOG4 Pre-Order EDI Specifications V 4.1.2"<sup>6</sup> FLASH 2/18/00 bulletin "LSOG 4 February Release Delayed One Week"<sup>7</sup> FLASH 2/27/00 bulletin "February Release of LSOG4 Into Production"<sup>8</sup> FLASH 10/25/99 bulletin "Part 1 of 2: Bell Atlantic's LSOG4 Pre-Order Business Rules Version 4.1"<sup>9</sup> FLASH 2/16/00 bulletin "Part 1 of 2: Bell Atlantic's LSOG4 Pre-Order EDI Specifications V 4.1.2"<sup>10</sup> FLASH 2/18/00 bulletin "LSOG 4 February Release Delayed One Week"

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- <sup>55</sup> FLASH 2/27/00 bulletin "February Release of LSOG4 Into Production"
- <sup>56</sup> FLASH 2/18/00 bulletin "LSOG 4 February Release Delayed One Week"
- <sup>57</sup> FLASH 2/27/00 bulletin "February Release of LSOG4 Into Production"
- <sup>58</sup> FLASH 9/2/99 bulletin "2 of 7: Individual North Report for Bell Atlantic Pre-Order Business Rules, v 2.5.1"
- <sup>59</sup> FLASH 9/2/99 bulletin "2 of 7: Individual North Report for Bell Atlantic Pre-Order Business Rules, v 2.5.1"
- <sup>60</sup> FLASH 10/7/99 bulletin "Launch of the Web GUI Phase III (CR#890))"
- <sup>61</sup> FLASH 10/7/99 bulletin "Launch of the Web GUI Phase III (CR#890))"
- <sup>62</sup> FLASH 10/28/99 bulletin "Informational Message: CR# 1053 and CR# 1054"
- <sup>63</sup> FLASH 10/28/99 bulletin "Informational Message: CR# 1053 and CR# 1054"
- <sup>64</sup> FLASH 10/28/99 bulletin "Informational Message: CR# 1053 and CR# 1054"
- <sup>65</sup> FLASH 10/28/99 bulletin "Informational Message: CR# 1053 and CR# 1054"
- <sup>66</sup> Industry Change Control January 2000
- <sup>67</sup> Industry Change Control January 2000
- <sup>68</sup> Industry Change Control January 2000
- <sup>69</sup> Industry Change Control January 2000
- <sup>70</sup> FLASH 12/6/99 bulletin "Documentation: CR# 906: xDSL Loop Qual-Addition of X4 Valid Entry in ADSLQUALCD"
- <sup>71</sup> FLASH 12/6/99 bulletin "Documentation: CR# 906: xDSL Loop Qual-Addition of X4 Valid Entry in ADSLQUALCD"
- <sup>72</sup> FLASH 12/14/99 bulletin "Part 8 of 8: Bell Atlantic's LSOG4 Combined Common Report of Bell Atlantic's Order Business Rules v 4.1.1 and EDI Specifications v 4.1.1"
- <sup>73</sup> FLASH 2/17/00 bulletin "Type 1 Sev 2 - CR# 1300: Order Business Rules Clarifications"
- <sup>74</sup> FLASH 2/18/00 bulletin "LSOG 4 February Release Delayed One Week"
- <sup>75</sup> FLASH 2/27/00 bulletin "February Release of LSOG4 Into Production"
- <sup>76</sup> FLASH 9/2/99 bulletin "7 of 7: Bell Atlantic's North Order Business Rules Version 1.7.1"
- <sup>77</sup> FLASH 9/2/99 bulletin "7 of 7: Bell Atlantic's North Order Business Rules Version 1.7.1"
- <sup>78</sup> FLASH 12/14/99 bulletin "Part 3 of 8 :Bell Atlantic's LSOG4 Combined Common Report of Bell Atlantic's Pre-Order Business Rules, v 4.1.1 and EDI Specifications, v 4.1.1"
- <sup>79</sup> FLASH 2/16/00 bulletin "Part 1 of 2: Bell Atlantic's LSOG4 Pre-Order EDI Specifications V 4.1.2"
- <sup>80</sup> FLASH 2/18/00 bulletin "LSOG 4 February Release Delayed One Week"
- <sup>81</sup> FLASH 2/27/00 bulletin "February Release of LSOG4 Into Production"